

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MARYLAND

(Northern Division)

IN THE MATTER OF THE COMPLAINT *

OF ETERNITY SHIPPING, LTD. AND * Civil Action No.:

EUROCARRIERS, S.A. FOR * LO1CV0250

EXONERATION FROM OR LIMITATION *

OF LIABILITY *

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Deposition of WILLEM SCHOONMADE

Baltimore, Maryland

Thursday, August 26, 2004

2:30 P.M.

Job No.: 1-39309

Pages 1 - 174, Volume 1

Reported by: Colleen L. Darkow, Notary Public

DEPOSITION OF WILLEM SCHOONMADE, VOLUME 1
CONDUCTED ON THURSDAY, AUGUST 26, 2004

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1 Q. All the depositions that are listed?

2 A. Yeah.

3 Q. Have you looked at any others, any other
4 depositions than those listed in your documents
5 reviewed section?

6 A. Not that I can think of.

7 Q. Anything else that you requested?

8 A. Yes, there is a -- the report of Mr. Heiner
9 Popp, the initial report I requested and that seemed to
10 be some kind of -- seemed to be kind of privileged
11 information.

12 Q. Privileged information?

13 A. That's what I understand.

14 Q. So it was not provided to you?

15 A. I have not seen yet Mr. Heiner Popp's report.

16 MR. CLYNE: For the record, I think
17 Mr. Popp's report was produced with the expert reports.

18 MR. WHITMAN: It was produced either with or
19 shortly before or after, I forget which now.

20 A. Well, I've requested for it in the very early
21 stage.

22 Q. All right.

DEPOSITION OF WILLEM SCHOONMADE, VOLUME I
CONDUCTED ON THURSDAY, AUGUST 26, 2004

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1 MR. WHITMAN: It was produced recently.

2 Q. In any event, you do not recall having seen
3 it yet?

4 A. I have not seen it yet.

5 Q. Anything else that you've seen in your list?

6 A. Not that I can think of.

7 Q. The rest of the materials were provided to
8 you?

9 A. They were.

10 Q. And is there anything else based upon -- now,
11 you have also attended certain depositions in this
12 matter, correct?

13 A. Yes. Well, deposition, Mr. Jim Dolan.
14 Mr. Jim Dolan's deposition I attended.

15 Q. Any others?

16 A. No.

17 Q. You've also attended inspections of the wire
18 rope and the vessel?

19 A. That's correct.

20 Q. How many inspections of the wire rope have
21 you attended?

22 A. One.